

EXHIBIT A

LEVY RATNER, P.C.

Attorneys at Law
80 Eighth Avenue, 8th Floor
New York, New York 10011-7175

Telephone (212) 627-8100
Telecopier (212) 627-8182

www.levyratner.com

Richard A. Levy
Daniel J. Ratner
Daniel Engelstein^o
Gwynne A. Wilcox^a
Pamela Jeffrey
Kevin Finnegan
Carl J. Levine^a
David Slutsky^a
Allyson L. Belovin
Suzanne Hepner^{*}
Richard Dorn
Robert H. Stroup
Dana E. Lossia^a

Susan J. Cameron^a
Micah Wissinger^{*}
Ryan J. Barbur
Vanessa Flores^a
Alexander Rabb
Michael R. Hickson
Shira T. Roza
Laureve D. Blackstone^a
Jorge A. Cisneros
Jacqueline Tekyl^a



April 1, 2013

**BY EMAIL AND OVERNIGHT
DELIVERY**

Michael D. Sirota
Cole, Schotz, Meisel, Forman & Leonard, P.A.
Court Plaza North, 25 Main Street
P.O. Box 800
Hackensack, NJ 07602-0800
(201) 489-3000
msirota@coleschotz.com

Re: **Subpoena addressed to David Pickus in 710 Long Ridge Road Operating Co.
II, LLC, et al., Chapter 11 No. 13-13653 (DHS)**

Dear Mr. Sirota:

Enclosed herewith please find Responses and Objections to the Subpoena propounded by you upon David Pickus, Bate Stamped Documents 001-052 and a Privilege Log referred to in the Responses and Objections to the Subpoena.

Very truly yours,

Suzanne Hepner

Enc.

SH:jac

Cc: Kathy Krieger (via e-mail)
Darin Dalmat (via e-mail)
John Creane (via e-mail)

79-014-00001: 10210001.doc

IN RE: 710 LONG RIDGEWOOD-BUSHWICK ROAD
OPERATING COMPANY II, LLC, et al.

RESPONSES AND OBJECTIONS TO SUBPOENA
TO DEPOSE WITNESS AND PRODUCE DOCUMENTS

TO: Michael D. Sirota
Cole, Schotz, Meisel, Forman & Leonard, P.A.
Court Plaza North, 25 Main Street
P.O. Box 800
Hackensack, NJ 07602-0800
(201) 489-3000
msirota@coleschotz.com

David Pickus (“Pickus”), President of the New England Health Care Employees Union, District 1199 (“Union”), by the undersigned counsel, hereby responds and objects to the subpoena issued by 710 Long Ridge Road Operating Company II, LLC, *et al.* (“HealthBridge”) as follows:

GENERAL RESPONSES AND OBJECTIONS TO SUBPOENA

The following General Responses and Objections are hereby incorporated into each of the Specific Responses as though set forth in full.

1. Pickus objects to the Subpoena in its entirety as being overly broad, unduly burdensome, and irrelevant, insofar as each Document Request requests the production of documents and the relation of facts that do not relate to or concern, nor are likely to lead to the discovery of any information relevant to or otherwise admissible as to the contested Venue Transfer Motion (“Transfer Motion”).

2. Pickus objects to each Document Request which seeks information not within his knowledge or possession, information which is already within the knowledge of HealthBridge, its agents, servants, an/or employees, or information which is unreasonably cumulative or duplicative, and which contain electronically stored information from sources that are not reasonably accessible because of undue burden or cost.

3. Pickus objects to each Document Request that requests documents or information which are subject to the attorney-client privilege, represents work product, constitutes privileged material prepared in anticipation of litigation, is protected by the joint-interest privilege, or is subject to any other privilege recognized at law, or which concerns speech, association, activities, and conduct protected against discovery by the First Amendment to the United States Constitution, the National Labor Relations Act, or other federal laws.

4. Pickus objects to each Document Request which requests production of documents or information which requires the Union to disclose trade secrets or other confidential research, development, or commercial information, including without limitation strategies, plans, policies, and methods for conducting lawful collective bargaining, organizing, labor relations, and other union activities.

5. Pickus objects to each Document Request which requests the production of records, documents, and/or information which are not within the purview of a request pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure.

6. Pickus objects to each Document Request which requests the identification of “each,” “every,” “all,” or “any” facts, language, documents, information or person which may be related

to a specific point or points, as being unduly burdensome. In each case where some answer or production is provided, such answer or production is based upon all information obtained by a logically directed search through the records of the Union.

7. Pickus objects to each Document Request which requests documents or information which are not within his knowledge or possession and which are not in the purview of the knowledge of the agents of the Union, its employees or attorneys.

8. Pickus reserves his right to amend these Responses and Objections to the Subpoena upon completion of discovery.

9. Pickus preserves and does not waive any of these objections with regard to any information or documentation which is produced in connection with these Responses to the Subpoena. Without waiving any objections aforesaid, Pickus makes the following Specific Responses and Objections to the Subponea as follows:

Specific Responses and Objections to Subpoena

Document Request no. 1: Any and all Documents by and between the Union and its bargaining unit employees in Long Ridge of Stamford, Newington Health Care Center, Westport Health Care Center, West River Health Care Center and Danbury Health Care Center from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery

of relevant evidence relating to the Transfer Motion. Furthermore, productions of such documents would require the Union disclose trade secrets or other confidential research, development, or commercial information, including strategies, plans, policies, and methods for conducting lawful collective bargaining, organizing, labor relations, and other union activities, and as such, is protected from production. Pickus further objects to this Document Request to the extent that it requests information subject to privilege, including attorney work product, Attorney-Client privilege, and the Union-Member Communications privilege. Without waiving this objection, Pickus responds as follows:

Response: To Pickus' knowledge, no such documents exist.

Document Request no. 2: Any and all Documents by and between the Union and the NLRB from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Pickus further objects to this Document Request to the extent that it requests information subject to privilege, including attorney work product and the joint interest privilege. Without waiving this objection, Pickus responds as follows:

Response: The Union asserts that all responsive documents are privileged. Please refer to the attached Privilege Log, which identifies and describes the privilege(s) asserted.

Document Request no. 3: Any and all Documents by and between the Union and any creditor of the Debtors as such term is defined in 11 U.S.C. § 101(10) from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Pickus further objects to this Document Request to the extent that it requests information subject to privilege, including attorney work product and the joint interest privilege. Without waiving this objection, Pickus responds as follows:

Response: The Union asserts that all responsive documents are privileged. Please refer to the attached Privilege Log, which identifies and describes the privilege(s) asserted.

Document Request no. 4: Any and all Documents by and between the Union and the Connecticut Department of Social Services from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged. Without waiving this objection, Pickus responds as follows.

Response: The Union asserts that all responsive documents are privileged. Please refer to the attached Privilege Log, which identifies and describes the privilege(s) asserted.

Document Request no. 5: Any and all Documents by and between the Union and the Connecticut Department of Public Health from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged. Without waiving this objection, Pickus responds as follows:

Response: The Union asserts that all responsive documents are privileged. Please refer to the attached Privilege Log, which identifies and describes the privilege(s) asserted.

Document Request no. 6: Any and all Documents by and between the Union and a department of the State of Connecticut not covered by Requests No. 4 and 5 from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged. Without waiving these objections, Pickus responds as follows:

Response: The Union is producing Documents 003-005, 008-011, 016-017 and 020-021, subject to and without waiving the stated objections. Cell phone numbers have been redacted.

Document Request no. 7: Any and all Documents by and between the Union and the Connecticut State Long Term Care Ombudsman from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged, and which are privileged under the Connecticut Ombudsman statutes. Without waiving these objections, Pickus responds as follows:

Response: To Pickus' knowledge, no such documents exist.

Document Request no. 8: Any and all Documents by and between the Union and Gov. Daniel Malloy and any member of his office from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged. Without waiving these objection, Pickus responds as follows:

Response: The Union is producing Documents 008-011, 016-017 and 020-021, subject to and without waiving the stated objections. Cell phone numbers have been redacted.

Document Request no. 9: Any and all Documents by and between the Union and Sen. Richard Blumenthal and any member of his office from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged. Without waiving these objections, Pickus responds as follows:

Response: The Union is producing Documents 001-015 and 018-052, subject to and without waiving the stated objections. Cell phone numbers have been redacted.

Document Request no. 10: Any and all Documents by and between the Union and Congresswoman Rosa DeLauro and any member of her office from the Petition Date to the present in any way related to these Debtors including, but not limited to, Documents relating to the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion. Furthermore, this Document Request seeks documents and communications which constitute protected speech, association, or conduct under the First Amendment and are therefore privileged. Without waiving this objection, Pickus responds as follows:

Response: To Pickus' knowledge, no such documents exist.

Document Request no. 11: Any and all Documents the Union intends to offer into evidence at the hearing on the Motion.

Response: At the present time, the Union does not intend to offer any further evidence other than the documents submitted with the Transfer Motion.

Document Request no. 12: A list identifying all people with knowledge of the facts supporting the Motion.

Objections: Pickus objects to this Document Request on the grounds that it is burdensome and overbroad and that it calls for evidence which is not likely to lead to discovery of relevant evidence relating to the Transfer Motion.


Document Request no. 13: A list identifying all people the Union intends to call s witnesses at the hearing on the Motion with a description of the testimony to be elicited and documents to be relied upon.

Response: At the present time, the Union does not intend to call any witnesses at the hearing on the Transfer Motion.

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 4/6/13

David Pickus 

Jennifer Smith

From: Kehoe, Richard (Blumenthal) <Richard_Kehoe@blumenthal.senate.gov>
Sent: Wednesday, March 06, 2013 11:23 AM
To: Jennifer Smith
Cc: Das, Riju (Blumenthal); Miller, Andrew (Blumenthal)
Subject: FW: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS
Attachments: healthbridge.pdf

FYI. Final version is now out.

From: Elizabeth Benton [mailto:elizabeth_benton@blumenthal.senate.gov]
Sent: Wednesday, March 06, 2013 10:42 AM
To: Kehoe, Richard (Blumenthal)
Subject: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS



For Immediate Release:
March 6, 2013

Contact: Elizabeth Benton (860) 729-3
Elizabeth_Benton@blumenthal.senate

BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

(Hartford, CT) – U.S. Senator Richard Blumenthal today urged the National Labor Relations Board to take legal action to preserve the pay and benefits of unionized HealthBridge nursing home employees following a bankruptcy court ruling that reduces pay and eliminates pension and health benefits provided in their labor agreement and imposed by court order.

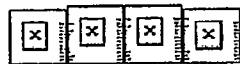
Last July, HealthBridge unilaterally locked out – under state law -- union workers at five nursing home facilities in Connecticut and refused to continue the pay, health insurance and pension benefits they had previously provided to their workers. In December, the federal District Court issued an injunction ordering HealthBridge to provide the same benefits and wages as set out in their previous

labor agreement. HealthBridge challenged the NLRB's findings that the compa violated federal labor laws and appealed the ruling to the Second Circuit Court Appeals seeking a stay of the court order on wages and benefits. Such stay w denied in several courts. After exhausting all avenues to obtain a stay of the c order, including the U.S. Supreme Court, HealthBridge obtained a Bankruptcy Court order from a New Jersey judge, allowing HealthBridge to continue impos for the next six weeks the same terms and conditions that led the workers to st in the first place.

In a letter to the NLRB, Blumenthal today urged the NLRB to take action to preserve the benefits and compensation of HealthBridge employees. "The Dist Court issued an injunction for a reason: this is a matter of urgency for these workers and their families. The employers should continue to fully comply with District Court's injunction and your office should ensure that the injunction continues to be fully enforced," Blumenthal stated.

A full text of the letter is attached.

###



[Click Here](#) to be removed from this list

Jennifer Smith

From: Das, Riju (Blumenthal) <Riju_Das@blumenthal.senate.gov>
Sent: Tuesday, March 05, 2013 10:33 AM
To: Jennifer Smith
Cc: Kehoe, Richard (Blumenthal)
Subject: RE: HealthBridge Injunction and Bankruptcy Ruling

Hi Jennifer,

Did the court issue a written ruling? If so, would you have it and be able to send along?

Riju Das
Research & Outreach Aide
Office of U.S. Senator Richard Blumenthal
90 State House Square, 10th Floor
Hartford, Connecticut, 06103
Office: 860.258.6949 • **Toll Free:** 800.334.5341 • **Fax:** 860.258.6958 • **Email:**
Riju_Das@blumenthal.senate.gov • **Web:** www.blumenthal.senate.gov/

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This message originates from the state Office of United States Senator Richard Blumenthal. The information contained in this message may be privileged and/or confidential. If you are not the intended recipient, please notify the sender immediately and destroy this message. Thank you.

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Monday, March 04, 2013 9:41 PM
To: Bob Godfrey; Chris.Perone@cga.ct.gov; Das, Riju (Blumenthal); David Arconti (david.arconti@cga.ct.gov); doyle@senatedems.ct.gov; George Jepsen; gerratana@senatedems.ct.gov; James Maroney (james.maroney@cga.ct.gov); John Fonfara; Jonathan Harris; jonathan.steinberg@cga.ct.gov; Kehoe, Richard (Blumenthal); Kenny Curran; kevin.lembo@po.state.ct.us; kim.rose@cga.ct.gov; leone@senatedems.ct.gov; Magnan, Maureen; mark.ojakian@ct.gov; matthew.lesser@gmail.com; MICHELLE GILMAN; Patricia Billie Miller; paul.davis@cga.ct.gov; Peter.Tercyak@cga.ct.gov; Reid, Terri; ricklopes183@yahoo.com; Russ Morin; Ryan, Rose; sandy.nafis@cga.ct.gov; slossberg@senatedems.ct.gov; Dunn, Joe (Murphy)
Subject: NEW: HealthBridge Injunction and Bankruptcy Ruling



For Immediate Release:

Monday, March 4, 2013

Union to urge Labor Board to pursue enforcement of District Court Injunction against HealthBridge, despite decision by New Jersey bankruptcy judge

Hartford, CT—Caregivers who returned to work this week after an eight-month strike at five Connecticut nursing homes remain confident that they will retain the wages and benefits ordered in an injunction issued by a District Court judge, despite a seemingly contradictory decision by a bankruptcy court judge in New Jersey, which was issued late on Monday afternoon.

In December 2012, Federal District Court Judge Robert N. Chatigny issued an injunction, at the request of the National Labor Relations Board, ordering New Jersey-based HealthBridge Management, to reinstate 600 nurses, nursing assistants and support staff to their former positions under all the terms and conditions of their expired contract, pending the final decision in an ongoing National Labor Relations Board trial against the company. The caregivers went on strike on July 3rd, 2013 after HealthBridge unilaterally imposed new contracts at the five facilities, an action the Labor Board cited as illegal.

In his “Ruling and Order,” Judge Chatigny wrote:

- (1) on or before December 17, 2011, Respondents shall offer every striker reinstatement to his or her former position, without prejudice to their seniority, rights and privileges previously enjoyed, displacing, if necessary, any other employees hired, transferred or reassigned to replace them;
- (2) Respondents shall reinstate the previous wages, benefits and other terms and conditions of employment for the employees that were in place on June 16, 2012, and rescind any or all unilateral changes implemented by Respondents;

Only days before caregivers were to return to work, HealthBridge filed a Chapter 11 Bankruptcy petition in New Jersey, seeking immediate modifications to wages and benefits for five of its eight nursing homes in Connecticut. At a hearing in Newark on Friday, March 1, Judge Donald H. Steckroth ruled that the federal court injunction issued in Connecticut would remain in force until he issued his ruling on Monday – one day after workers began returning to their jobs under the terms and conditions of the expired contract.

“We knew HealthBridge was going to try every trick in the book – legal or otherwise,” said Sophia Forbes, a Certified Nursing Assistant who just returned to her position at the Newington Health Care Center. “They’re still trying to delay justice for me and my coworkers, but we are standing strong for fairness at work and for quality care for our patients. The law is on our side and we will win, no matter how many stunts they pull.”

The opinion issued by Judge Steckroth late Monday afternoon purports to give HealthBridge the right to temporarily modify wages and benefits at the five facilities for a period of six weeks, although not to change the other terms and conditions of employment altered when the company unilaterally implemented new contracts in June, 2012.

David Pickus, President of the New England Health Care Employees Union, District 1199, said, "It is clear to us that the Bankruptcy Judge does not have jurisdiction here to effectively negate any of the directives of Judge Chatigny's injunction. HealthBridge's motion to stay Judge Chatigny's injunction has already been summarily rejected by the Judge, by the Second Circuit Court of Appeals and finally by the US Supreme Court."

"The National Labor Relations Board has informed us that they intend to seek enforcement of the injunction as it stands. If not, any unscrupulous employer, faced with federal decisions and orders based on their own unlawful behavior, could simply go to bankruptcy court to negate any contractual obligation by crying poor and constructing dire financial projections without producing any real evidence."

"Throughout those appeals processes, HealthBridge had every opportunity to provide the financial and other information that would support their spurious claims of the financial harm that would result from compliance with the injunction. Not only did they not do so, but, as Judge Chatigny noted in his ruling, HealthBridge's *lead negotiator stated to Union negotiators, "with respect to the pension . . . did you hear me say we can't afford it? . . . if I said that we'd have to open up our books, we're not pleading an inability to pay."*

"Our members are back doing what they love – taking care of their patients. What HealthBridge is attempting to do is subvert the course of justice and set themselves beyond the law. In 2011 alone, they collected \$161 million in public Medicaid and Medicare dollars, which are intended to provide patient care. How many of those dollars have been diverted to attorney's fees instead?"

-30-

Jennifer Smith

From: Das, Riju (Blumenthal) <Riju_Das@blumenthal.senate.gov>
Sent: Saturday, March 02, 2013 11:57 AM
To: Jennifer Smith
Subject: Re: HealthBridge Strikers Return to Work Sunday March 3

Thanks for this!

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Saturday, March 02, 2013 11:51 AM
To: Das, Riju (Blumenthal)
Subject: FW: HealthBridge Strikers Return to Work Sunday March 3

FYI

From: Deborah Chernoff
Sent: Saturday, March 02, 2013 11:48 AM
To: Deborah Chernoff
Subject: HealthBridge Strikers Return to Work Sunday March 3



SEIUHealthcare.
United for Quality Care

For Immediate Release: Saturday, March 2, 2013
Contact: Deborah Chernoff, Communications Director, District 1199
[REDACTED] [cell] or dchernoff@seiu1199ne.org

****NEWS MEDIA ADVISORY for SUNDAY, MARCH 3, 2013****

HealthBridge Nursing Home Workers Back on the Job Sunday, after Eight Months on Strike

Senator Blumenthal to Join Workers Sunday Afternoon at 2:30 PM at West River facility in Milford

After eight months on the picket lines for nurses, aides, and support staff at five HealthBridge-operated nursing homes in Connecticut, striking workers will return to the jobs and residents they have missed on Sunday, March 3. Though HealthBridge is still trying to avoid its legal obligations to its employees under a District Court injunction, the caregivers are returning to their jobs under the

same terms and conditions of their prior Collective Bargaining Agreement—a major victory for HealthBridge workers and residents.

United States Senator **Richard Blumenthal** will join workers outside the HealthBridge facility in Milford in celebration of that victory Sunday afternoon as the morning shift workers depart and afternoon shift workers report for the first day back caring for their residents.

"I am so excited to get back to the job and the patients I love. HealthBridge is still trying to delay justice for me and my coworkers, but we are standing strong for fairness at work and for quality care for our patients. On Sunday, after eight months on the picket lines, we'll be one step closer to achieving those goals." - Sophia Forbes, a Certified Nursing Assistant at the Newington Health Care Center

-30-

The times and locations of Sunday's return to work are as follows:

First shift will gather at 6:30 AM and report to work by 7:00 AM at all locations

Second shift will gather at 2:30 PM and report to work by 3:00 PM at all locations

Third shift will gather at 10:30 PM and report to work by 11:00 PM at all locations

Danbury Health Care Center	107 Osborne Street, Danbury, CT
Ask for: Daniel Hayes	
Newington Health Care Center	240 Church Street, Newington, CT
Ask for: Puya Gerami	
Long Ridge of Stamford	710 Long Ridge Rd, Stamford, CT
Ask for: Joel Brooks	
Westport Health Care Center	1 Burr Road, Westport, CT
Ask for: Ancy Destin	
West River Health Care Center	245 Orange Avenue, Milford, CT
Ask for: Jesse Martin	

Senator Richard Blumenthal will be at the West River Health Care Center in Milford at 2:30 PM

Deborah Chernoff
Communications Director
New England Health Care Employees Union, District 1199
SEIU Healthcare
(860) 251-6042
[REDACTED] [cell]

Jennifer Smith

From: Das, Riju (Blumenthal) <Riju_Das@blumenthal.senate.gov>
Sent: Saturday, March 02, 2013 11:56 AM
To: Jennifer Smith
Subject: Re: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

[REDACTED]
I won't be with him, but our driver Kevin will be, [REDACTED]

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Saturday, March 02, 2013 11:54 AM
To: Das, Riju (Blumenthal)
Subject: RE: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

Remind me your cell...its disappeared from my phone

From: Das, Riju (Blumenthal) [mailto:Riju_Das@blumenthal.senate.gov]
Sent: Saturday, March 02, 2013 11:48 AM
To: Jennifer Smith
Subject: Re: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

Yeah, meant the Milford nursing home. Wasn't sure if you'd be there, but now that I know, I'll be sure to put you down. Thanks, and congrats (sorta, kinda).

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Saturday, March 02, 2013 11:43 AM
To: Das, Riju (Blumenthal)
Subject: RE: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

By "at the facility" I assume you mean us? I should be there, but here are two other people who definitely will be there that you can also contact:

Deborah Chernoff, 1199 Communications (press): cell – [REDACTED]
Jesse Martin, 1199 Organizer at West River: cell – 4 [REDACTED]

I should be there, and you can always reach me on my cell [REDACTED].

Thanks!

From: Das, Riju (Blumenthal) [mailto:Riju_Das@blumenthal.senate.gov]
Sent: Saturday, March 02, 2013 11:40 AM
To: Jennifer Smith
Subject: FW: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

Hi Jennifer,

With RB coming at 2:30p, who's a good contact at the facility at that time to give him?

From: Kehoe, Richard (Blumenthal)
Sent: Saturday, March 02, 2013 7:43 AM
To: Nestor, Dana (Blumenthal); Das, Riju (Blumenthal); Benton, Elizabeth (Blumenthal)
Subject: Fw: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

From: Jennifer Smith [<mailto:JSmith@seiu1199ne.org>]
Sent: Friday, March 01, 2013 09:48 PM
To: Kehoe, Richard (Blumenthal)
Subject: Re: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

Fabulous!

245 Orange Ave, Milford, CT

Sent from my Verizon Wireless 4G LTE Smartphone

----- Original message -----

From: "Kehoe, Richard (Blumenthal)" <Richard_Kehoe@blumenthal.senate.gov>
Date:
To: Jennifer Smith <JSmith@seiu1199ne.org>
Subject: Re: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

Senator blumenthal will be at the milford facility at 230. What is the address? I think he has been there

From: Jennifer Smith [<mailto:JSmith@seiu1199ne.org>]
Sent: Friday, March 01, 2013 03:18 PM
To: Bob Godfrey <bob.godfrey@cga.ct.gov>; Chris.Perone@cga.ct.gov <Chris.Perone@cga.ct.gov>; Das, Riju (Blumenthal); David Arconti (david.arconti@cga.ct.gov) <david.arconti@cga.ct.gov>; doyle@senatedems.ct.gov <doyle@senatedems.ct.gov>; George Jepsen <georgecjepsen@gmail.com>; gerratana@senatedems.ct.gov <gerratana@senatedems.ct.gov>; James Maroney (james.maroney@cga.ct.gov) <james.maroney@cga.ct.gov>; John Fonfara <jf550@sbcglobal.net>; Jonathan Harris <jharris@ctdems.org>; jonathan.steinberg@cga.ct.gov <jonathan.steinberg@cga.ct.gov>; Kehoe, Richard (Blumenthal); Kenny Curran <kenny@chrismurphy.com>; kevin.lembo@po.state.ct.us <kevin.lembo@po.state.ct.us>; kim.rose@cga.ct.gov <kim.rose@cga.ct.gov>; leone@senatedems.ct.gov <leone@senatedems.ct.gov>; 'Magnan, Maureen' <Maureen.Magnan@cga.ct.gov>; mark.ojakian@ct.gov <mark.ojakian@ct.gov>; matthew.lesser@gmail.com <matthew.lesser@gmail.com>; MICHELLE GILMAN <michelle.gilman@PO.STATE.CT.US>; Patricia Billie Miller <patricia.miller@cga.ct.gov>; paul.davis@cga.ct.gov <paul.davis@cga.ct.gov>; Peter.Tercyak@cga.ct.gov <Peter.Tercyak@cga.ct.gov>; Reid, Terri <Terri.Reid@cga.ct.gov>; ricklopes183@yahoo.com <ricklopes183@yahoo.com>; Russ Morin <ramorin3761@aol.com>; Ryan, Rose <Rose.Ryan@cga.ct.gov>; sandy.nafis@cga.ct.gov <sandy.nafis@cga.ct.gov>; slossberg@senatedems.ct.gov <slossberg@senatedems.ct.gov>
Subject: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing



SEIUHealthcare.
 United for Quality Care

For Immediate Release: Friday, March 1, 2013

Contact: Deborah Chernoff, District 1199, [REDACTED] or dchernoff@seiu1199ne.org

BREAKING NEWS:

Strikers Heading Back to Work Sunday at Five HealthBridge Homes under terms of District Court Injunction

Newark, NJ— After eight months on strike, more than 600 caregivers at five Connecticut nursing homes will be heading back to work on Sunday, March 3rd, under the terms and conditions of their expired contract, as ordered under a District Court Injunction against the facility operator, HealthBridge Management.

"The injunction remains in effect – and that means HealthBridge has to restore all of the benefits and other conditions of employment that were in place before they unlawfully imposed unilateral terms of employment changest," said David Pickus, President of the New England Health Care Employees Union, District 1199, SEIU.

"What's more, the National Labor Relations Board argued today that the bankruptcy court doesn't have jurisdiction here. If Judge Donald H. Steckroth issues any ruling which conflicts with the clear directive of the injunction to restore workers to their jobs under the terms of their expired contract,

the Board will take action to enforce the injunction as it was ordered by District Court Judge Robert Chatigny.”

“HealthBridge has already filed multiple appeals on the same grounds of financial harm as they presented today. All of those appeals were rejected: first by Judge Chatigny, then by the Second Circuit Court of Appeals, then by US Supreme Court Justice Ruth Bader Ginsburg, and finally by the entire US Supreme Court. “

“Throughout those appeals processes, HealthBridge had every opportunity to provide the financial and other information that would support their spurious claims of the financial harm that would result from compliance with the injunction. No such evidence or documentation was ever provided, despite repeated union requests.”

“Now at the eleventh hour they come in with unverifiable claims about the five nursing homes and without including the controlling company, HealthBridge Management, in the bankruptcy filing. The only reason can be that they will not and cannot provide evidence to support their claims and this is simply another attempt to manipulate the legal process to avoid the consequences of their own unlawful behavior.”

“Despite their worst efforts, our members will be returning on Sunday to the jobs and patients they love, ready to meet the next legal roadblock HealthBridge tries to raise.”

-30-

Jennifer Smith

From: Kehoe, Richard (Blumenthal) <Richard_Kehoe@blumenthal.senate.gov>
Sent: Friday, March 01, 2013 3:25 PM
To: Jennifer Smith
Subject: Re: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

By the way, Dick cannot make the 630 start on Sunday. He was wondering if you would do a similar event for the second shift? Maybe more likely to get press

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Friday, March 01, 2013 03:18 PM
To: Bob Godfrey <bob.godfrey@cga.ct.gov>; Chris Perone <Chris.Perone@cga.ct.gov>; Das, Riju (Blumenthal); David Arconti (david.arconti@cga.ct.gov) <david.arconti@cga.ct.gov>; doyle@senatedems.ct.gov <doyle@senatedems.ct.gov>; George Jepsen <georgecjepsen@gmail.com>; gerratana@senatedems.ct.gov <gerratana@senatedems.ct.gov>; James Maroney (james.maroney@cga.ct.gov) <james.maroney@cga.ct.gov>; John Fonfara <jf550@sbcglobal.net>; Jonathan Harris <jharris@ctdems.org>; jonathan.steinberg@cga.ct.gov <jonathan.steinberg@cga.ct.gov>; Kehoe, Richard (Blumenthal); Kenny Curran <kenny@chrismurphy.com>; Kevin Lembo <kevin.lembo@po.state.ct.us>; kim.rose@cga.ct.gov <kim.rose@cga.ct.gov>; leone@senatedems.ct.gov <leone@senatedems.ct.gov>; 'Magnan, Maureen' <Maureen.Magnan@cga.ct.gov>; mark.ojakian@ct.gov <mark.ojakian@ct.gov>; matthew.lesser@gmail.com <matthew.lesser@gmail.com>; MICHELLE GILMAN <michelle.gilman@PO.STATE.CT.US>; Patricia Billie Miller <patricia.miller@cga.ct.gov>; paul.davis@cga.ct.gov <paul.davis@cga.ct.gov>; Peter Tercyak <Peter.Tercyak@cga.ct.gov>; Reid, Terri <Terri.Reid@cga.ct.gov>; ricklopes183@yahoo.com <ricklopes183@yahoo.com>; Russ Morin <ramorin3761@aol.com>; Ryan, Rose <Rose.Ryan@cga.ct.gov>; sandy.nafis@cga.ct.gov <sandy.nafis@cga.ct.gov>; slossberg@senatedems.ct.gov <slossberg@senatedems.ct.gov>
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Contact: Deborah Chernoff, District 1199, [REDACTED] or dchernoff@seiu1199ne.org

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Jennifer Smith

From: Kehoe, Richard (Blumenthal) <Richard_Kehoe@blumenthal.senate.gov>
Sent: Friday, March 01, 2013 3:22 PM
To: Jennifer Smith
Subject: Re: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing

Great

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Friday, March 01, 2013 03:18 PM
To: Bob Godfrey <bob.godfrey@cga.ct.gov>; Chris.Perone@cga.ct.gov <Chris.Perone@cga.ct.gov>; Das, Riju (Blumenthal); David Arconti (david.arconti@cga.ct.gov) <david.arconti@cga.ct.gov>; doyle@senatedems.ct.gov <doyle@senatedems.ct.gov>; George Jepsen <georgecjepsen@gmail.com>; gerratana@senatedems.ct.gov <gerratana@senatedems.ct.gov>; James Maroney (james.maroney@cga.ct.gov) <james.maroney@cga.ct.gov>; John Fonfara <jf550@sbcglobal.net>; Jonathan Harris <jharris@ctdems.org>; jonathan.steinberg@cga.ct.gov <jonathan.steinberg@cga.ct.gov>; Kehoe, Richard (Blumenthal); Kenny Curran <kenny@chrismurphy.com>; kevin.lembo@po.state.ct.us <kevin.lembo@po.state.ct.us>; kim.rose@cga.ct.gov <kim.rose@cga.ct.gov>; leone@senatedems.ct.gov <leone@senatedems.ct.gov>; 'Magnan, Maureen' <Maureen.Magnan@cga.ct.gov>; mark.ojakian@ct.gov <mark.ojakian@ct.gov>; matthew.lesser@gmail.com <matthew.lesser@gmail.com>; MICHELLE GILMAN <michelle.gilman@PO.STATE.CT.US>; Patricia Billie Miller <patricia.miller@cga.ct.gov>; paul.davis@cga.ct.gov <paul.davis@cga.ct.gov>; Peter.Tercyak@cga.ct.gov <Peter.Tercyak@cga.ct.gov>; Reid, Terri <Terri.Reid@cga.ct.gov>; ricklopes183@yahoo.com <ricklopes183@yahoo.com>; Russ Morin <ramorin3761@aol.com>; Ryan, Rose <Rose.Ryan@cga.ct.gov>; sandy.nafis@cga.ct.gov <sandy.nafis@cga.ct.gov>; slossberg@senatedems.ct.gov <slossberg@senatedems.ct.gov>
Subject: BREAKING NEWS: Injunction remains in effect at HealthBridge despite bankruptcy filing



SEIUHealthcare®
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For Immediate Release: Friday, March 1, 2013

Contact: Deborah Chernoff, District 1199, [REDACTED] or dchernoff@seiu1199ne.org

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Jennifer Smith

From: Rep. Arconti, David <David.Arconti@cga.ct.gov>
Sent: Monday, February 25, 2013 9:19 PM
To: Jennifer Smith
Subject: RE: HealthBridge's newest move

WOW

From: Jennifer Smith [JSmith@seiu1199ne.org]
Sent: Monday, February 25, 2013 6:07 PM
To: Jennifer Smith
Cc: Rep. Godfrey, Bob; Rep. Perone, Chris; Das, Riju (Blumenthal; Rep. Arconti, David; Senator Doyle; George Jepsen; Senator Gerratana; Rep. Maroney, James; John Fonfara; Jonathan Harris; Rep. Steinberg, Jonathan; Kehoe, Richard (Blumenthal; Kenny Curran; kevin.lembo@po.state.ct.us; Rep. Rose, Kim; Senator Leone; Magnan, Maureen; mark.ojakian@ct.gov; matthew.lesser@gmail.com; MICHELLE GILMAN; Rep. Miller, Patricia; Rep. Davis, Paul; Rep. Tercyak, Peter; Reid, Terri; ricklopes183@yahoo.com; Russ Morin ; Ryan, Rose; Rep. Nafis, Sandy; Senator Slossberg
Subject: HealthBridge's newest move

In their latest move, HealthBridge today filed for Chapter 11 bankruptcy – of course, only for the five (5) Connecticut striking facilities -- in New Jersey court. As you know, the 600 workers had been scheduled to return to work this coming Sunday, March 3.

It is our position the court should hold HealthBridge in contempt if they do not comply with the original injunction as ordered. In addition, the State should put these homes into state receivership immediately until a more responsible and law-abiding operator can take over.

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"HealthBridge is currently under an injunction from a federal judge to reinstate striking workers until a final decision is reached in the National Labor Relations Board case against the company. HealthBridge appealed for a stay of that injunction, which includes restoring benefits to workers from whom they were illegally stripped, all the way to the Supreme Court. Those appeals have all been denied.

"Since the appeals process didn't work in its favor, the company is now trying to use bankruptcy to avoid its legal obligations to employees under the injunction. In fact, a recent investigation found that the company reported losses at non-union facilities in 2011 and 2012, at the same time that they were paying out high management costs to their related management company, HealthBridge Management. Those fees have nothing to do with compensation for union workers. The fact is that this is a company that would rather squander resources on exorbitant lawyer fees rather than treat its workers fairly and ensure patients have the high quality care they deserve.

"Instead of wasting resources trying to avoid responsibility for its actions, HealthBridge should own up to its actions and make this right. HealthBridge employees and residents deserve no less. The State of Connecticut can and should put these homes into state receivership immediately until a more responsible and law-abiding operator can be secured to run them as centers of care for the elderly.

"If the financial situation is as dire as HealthBridge claims in its press releases, receivership would certainly be in the best interests of all of the residents of those five homes, the workers and the taxpayers of Connecticut, who provide most of the millions of dollars annually for care of the elderly in HealthBridge homes."

###

Jennifer Smith
Political Director
District 1199/SEIU Healthcare

O: 860-251-6006
jsmith@seiu1199ne.org

Jennifer Smith

From: Kehoe, Richard (Blumenthal) <Richard_Kehoe@blumenthal.senate.gov>
Sent: Monday, February 25, 2013 7:57 PM
To: Jennifer Smith
Subject: Re: HealthBridge's newest move

Wow! Shameless

From: Jennifer Smith [mailto:JSmith@seiu1199ne.org]
Sent: Monday, February 25, 2013 06:07 PM
To: Jennifer Smith <JSmith@seiu1199ne.org>
Cc: Bob Godfrey <bob.godfrey@cga.ct.gov>; Chris.Perone@cga.ct.gov <Chris.Perone@cga.ct.gov>; Das, Riju (Blumenthal); David Arconti (david.arconti@cga.ct.gov) <david.arconti@cga.ct.gov>; doyle@senatedems.ct.gov <doyle@senatedems.ct.gov>; George Jepsen <georgecjepsen@gmail.com>; gerratana@senatedems.ct.gov <gerratana@senatedems.ct.gov>; James Maroney (james.maroney@cga.ct.gov) <james.maroney@cga.ct.gov>; John Fonfara <jf550@sbcglobal.net>; Jonathan Harris <jharris@ctdems.org>; jonathan.steinberg@cga.ct.gov <jonathan.steinberg@cga.ct.gov>; Kehoe, Richard (Blumenthal); Kenny Curran <kenny@chrismurphy.com>; kevin.lembo@po.state.ct.us <kevin.lembo@po.state.ct.us>; kim.rose@cga.ct.gov <kim.rose@cga.ct.gov>; leone@senatedems.ct.gov <leone@senatedems.ct.gov>; 'Magnan, Maureen' <Maureen.Magnan@cga.ct.gov>; mark.ojakian@ct.gov <mark.ojakian@ct.gov>; matthew.lesser@gmail.com <matthew.lesser@gmail.com>; MICHELLE GILMAN <michelle.gilman@PO.STATE.CT.US>; Patricia Billie Miller <patricia.miller@cga.ct.gov>; paul.davis@cga.ct.gov <paul.davis@cga.ct.gov>; Peter.Tercyak@cga.ct.gov <Peter.Tercyak@cga.ct.gov>; Reid, Terri <Terri.Reid@cga.ct.gov>; ricklopes183@yahoo.com <ricklopes183@yahoo.com>; Russ Morin <ramorin3761@aol.com>; Ryan, Rose <Rose.Ryan@cga.ct.gov>; sandy.nafis@cga.ct.gov <sandy.nafis@cga.ct.gov>; slossberg@senatedems.ct.gov <slossberg@senatedems.ct.gov>
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Political Director
District 1199/SEIU Healthcare

O: 860-251-6006
jsmith@seiu1199ne.org

Jennifer Smith

From: Jennifer Smith
Sent: Thursday, February 28, 2013 2:20 PM
To: Bob Godfrey; 'Chris.Perone@cga.ct.gov'; 'Das, Riju (Blumenthal)'; David Arconti (david.arconti@cga.ct.gov); doyle@senatedems.ct.gov; George Jepsen; 'gerratana@senatedems.ct.gov'; James Maroney (james.maroney@cga.ct.gov); John Fonfara; Jonathan Harris; 'jonathan.steinberg@cga.ct.gov'; 'Kehoe, Richard (Blumenthal)'; 'Kenny Curran'; 'kevin.lembo@po.state.ct.us'; kim.rose@cga.ct.gov; leone@senatedems.ct.gov; 'Magnan, Maureen'; mark.ojakian@ct.gov; 'matthew.lesser@gmail.com'; 'MICHELLE GILMAN'; Patricia Billie Miller; 'paul.davis@cga.ct.gov'; 'Peter.Tercyak@cga.ct.gov'; 'Reid, Terri'; ricklopes183@yahoo.com; Russ Morin ; 'Ryan, Rose'; sandy.nafis@cga.ct.gov; slossberg@senatedems.ct.gov
Subject: THIS SUNDAY: Join HealthBridge strikers as we return to work!

HealthBridge workers ARE planning to RETURN TO WORK this Sunday, March 3 as ordered by the federal court injunction!

All workers will gather at 6:30 AM this Sunday outside each facility (Milford, Newington, Westport, Stamford, and Danbury) in a show of unity to support the first-shift workers as they walk back in together to resume their jobs.

We invite you to join us for this momentous occasion! It really is a touching moment to see workers walk in with their heads held high in unity. Also, these workers are walking back into a very hostile work environment, so it will be comforting to see that leaders like you have their back.

WHEN: This Sunday, March 3
6:30 AM (everything will be over and done by 7:01 AM)
WHERE: Your local HealthBridge facility (Milford, Newington, Westport, Stamford, and Danbury)

PLEASE hit reply and let me know if you plan on being there (just in case HealthBridge pulls another last-minute dirty trick in court on Friday or Saturday.)

We really look forward to seeing you Sunday morning.

Sunday is a great battle victory, but the ongoing fight is not yet won. Thanks again for your ongoing support.

Jennifer

Jennifer Smith
Political Director

District 1199/SEIU Healthcare

O: 860-251-6006

C: [REDACTED]

jsmith@seiu1199ne.org

Jennifer Smith

From: Jennifer Smith
Sent: Tuesday, February 26, 2013 1:45 PM
To: Kehoe, Richard (Blumenthal)
Subject: Re: HealthBridge's newest move

Rich, the 1199 Healthbridge workers ARE going back to work this Sunday starting first shift. You mentioned the Senator might want to join us at one of the facilities for this? As I mentioned, we have all the workers gather in a show of unity and send in the first-shifters to work. We'd love to have the Senator join us at the MILFORD facility this Sunday at 6:30 AM. It will all be over by 7:10 am. Let me know of this is works.

Thanks for all your support !

Jennifer

On Feb 25, 2013, at 7:57 PM, "Kehoe, Richard (Blumenthal)" <Richard_Kehoe@blumenthal.senate.gov> wrote:

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Sent: Monday, February 25, 2013 06:07 PM
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Cc: Bob Godfrey <bob.godfrey@cga.ct.gov>; Chris.Perone@cga.ct.gov>; Chris.Perone@cga.ct.gov>; Das, Riju (Blumenthal); David Arconti (david.arconti@cga.ct.gov) <david.arconti@cga.ct.gov>; doyle@senatedems.ct.gov <doyle@senatedems.ct.gov>; George Jepsen <georgecjepsen@gmail.com>; gerratana@senatedems.ct.gov <gerratana@senatedems.ct.gov>; James Maroney (james.maroney@cga.ct.gov) <james.maroney@cga.ct.gov>; John Fonfara <jf550@sbcglobal.net>; Jonathan Harris <jharris@ctdems.org>; jonathan.steinberg@cga.ct.gov <jonathan.steinberg@cga.ct.gov>; Kehoe, Richard (Blumenthal); Kenny Curran <kenny@chrismurphy.com>; kevin.lembo@po.state.ct.us <kevin.lembo@po.state.ct.us>; kim.rose@cga.ct.gov <kim.rose@cga.ct.gov>; leone@senatedems.ct.gov <leone@senatedems.ct.gov>; 'Magnan, Maureen' <Maureen.Magnan@cga.ct.gov>; mark.ojakian@ct.gov <mark.ojakian@ct.gov>; matthew.lessner@gmail.com <matthew.lessner@gmail.com>; MICHELLE GILMAN <michelle.gilman@PO.STATE.CT.US>; Patricia Billie Miller <patricia.miller@cga.ct.gov>; paul.davis@cga.ct.gov <paul.davis@cga.ct.gov>; Peter.Tercyak@cga.ct.gov> <Peter.Tercyak@cga.ct.gov>; Reid, Terri <Terri.Reid@cga.ct.gov>; ricklopes183@yahoo.com <ricklopes183@yahoo.com>; Russ Morin <ramorin3761@aol.com>; Ryan, Rose <Rose.Ryan@cga.ct.gov>; sandy.nafis@cga.ct.gov <sandy.nafis@cga.ct.gov>; slossberg@senatedems.ct.gov <slossberg@senatedems.ct.gov>

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"Instead of wasting resources trying to avoid responsibility for its actions, HealthBridge should own up to its actions and make this right. HealthBridge employees and residents

deserve no less. The State of Connecticut can and should put these homes into state receivership immediately until a more responsible and law-abiding operator can be secured to run them as centers of care for the elderly.

"If the financial situation is as dire as HealthBridge claims in its press releases, receivership would certainly be in the best interests of all of the residents of those five homes, the workers and the taxpayers of Connecticut, who provide most of the millions of dollars annually for care of the elderly in HealthBridge homes."

###

Jennifer Smith
Political Director
District 1199/SEIU Healthcare

O: 860-251-6006
jsmith@seiu1199ne.org

Jennifer Smith

From: Jennifer Smith
Sent: Wednesday, March 06, 2013 11:30 AM
To: Richard_Kehoe@blumenthal.senate.gov
Subject: RE: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

Thanks so much!

Sent from my Verizon Wireless 4G LTE Smartphone

----- Original message -----

From: "Kehoe, Richard (Blumenthal)" <Richard_Kehoe@blumenthal.senate.gov>
Date:
To: Jennifer Smith <JSmith@seiu1199ne.org>
Cc: "Das, Riju (Blumenthal)" <Riju_Das@blumenthal.senate.gov>, "Miller, Andrew (Blumenthal)" <Andrew_Miller@blumenthal.senate.gov>
Subject: FW: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

FYI. Final version is now out.

From: Elizabeth Benton [mailto:elizabeth_benton@blumenthal.senate.gov]
Sent: Wednesday, March 06, 2013 10:42 AM
To: Kehoe, Richard (Blumenthal)
Subject: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS



RICHARD BLUMENTHAL
UNITED STATES SENATOR *for* CONNECTICUT



For Immediate Release:
March 6, 2013

Contact: Elizabeth Benton (860) 729-
[Elizabeth_Benton@blumenthal.senate](mailto:Elizabeth_Benton@blumenthal.senate.gov)

BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

(Hartford, CT) – U.S. Senator Richard Blumenthal today urged the National Labor Relations Board to take legal action to preserve the pay and benefits of unionized HealthBridge nursing home employees following a bankruptcy court ruling that reduces pay and eliminates pension and health benefits provided in their labor agreement and imposed by court order.

Last July, HealthBridge unilaterally locked out – under state law -- union workers at five nursing home facilities in Connecticut and refused to continue the pay, health insurance and pension benefits they had previously provided to their workers. In December, the federal District Court issued an injunction ordering HealthBridge to provide the same benefits and wages as set out in their previous labor agreement. HealthBridge challenged the NLRB's findings that the company violated federal labor laws and appealed the ruling to the Second Circuit Court of Appeals seeking a stay of the court order on wages and benefits. Such stay was denied in several courts. After exhausting all avenues to obtain a stay of the court order, including the U.S. Supreme Court, HealthBridge obtained a Bankruptcy Court order from a New Jersey judge, allowing HealthBridge to continue imposing for the next six weeks the same terms and conditions that led the workers to strike in the first place.

In a letter to the NLRB, Blumenthal today urged the NLRB to take action to preserve the benefits and compensation of HealthBridge employees. "The District Court issued an injunction for a reason: this is a matter of urgency for these workers and their families. The employers should continue to fully comply with the District Court's injunction and your office should ensure that the injunction continues to be fully enforced," Blumenthal stated.

A full text of the letter is attached.

###



[Click Here](#) to be removed from this list

Jennifer Smith

From: Jennifer Smith
Sent: Wednesday, March 06, 2013 11:29 AM
To: Riju Das@blumenthal.senate.gov
Subject: RE: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

Wow thanks!

Sent from my Verizon Wireless 4G LTE Smartphone

----- Original message -----

From: "Das, Riju (Blumenthal)" <Riju_Das@blumenthal.senate.gov>
Date:
To: Jennifer Smith <JSmith@seiu1199ne.org>
Subject: FW: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

Hi Jennifer,

FYI.

Riju Das
Research & Outreach Aide
Office of U.S. Senator Richard Blumenthal
90 State House Square, 10th Floor
Hartford, Connecticut, 06103
Office: 860.258.6949 • **Toll Free:** 800.334.5341 • **Fax:** 860.258.6958 • **Email:**
Riju_Das@blumenthal.senate.gov • **Web:** www.blumenthal.senate.gov/

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This message originates from the state Office of United States Senator Richard Blumenthal. The information contained in this message may be privileged and/or confidential. If you are not the intended recipient, please notify the sender immediately and destroy this message. Thank you.

From: Elizabeth Benton [mailto:elizabeth_benton@blumenthal.senate.gov]

Sent: Wednesday, March 06, 2013 10:42 AM

To: Das, Riju (Blumenthal)

Subject: RELEASE: BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS



RICHARD BLUMENTHAL
UNITED STATES SENATOR *for* CONNECTICUT



For Immediate Release:
March 6, 2013

Contact: Elizabeth Benton (860) 729-3
Elizabeth_Benton@blumenthal.senate

BLUMENTHAL URGES NLRB TO TAKE ACTION TO PRESERVE COMPENSATION FOR HEALTHBRIDGE WORKERS

(Hartford, CT) – U.S. Senator Richard Blumenthal today urged the National Labor Relations Board to take legal action to preserve the pay and benefits of unionized HealthBridge nursing home employees following a bankruptcy court ruling that reduces pay and eliminates pension and health benefits provided in their labor agreement and imposed by court order.

Last July, HealthBridge unilaterally locked out – under state law -- union workers at five nursing home facilities in Connecticut and refused to continue the pay, health insurance and pension benefits they had previously provided to their workers. In December, the federal District Court issued an injunction ordering HealthBridge to provide the same benefits and wages as set out in their previous labor agreement. HealthBridge challenged the NLRB's findings that the company violated federal labor laws and appealed the ruling to the Second Circuit Court of Appeals seeking a stay of the court order on wages and benefits. Such stay was denied in several courts. After exhausting all avenues to obtain a stay of the court order, including the U.S. Supreme Court, HealthBridge obtained a Bankruptcy

Court order from a New Jersey judge, allowing HealthBridge to continue impose for the next six weeks the same terms and conditions that led the workers to strike in the first place.

In a letter to the NLRB, Blumenthal today urged the NLRB to take action to preserve the benefits and compensation of HealthBridge employees. "The District Court issued an injunction for a reason: this is a matter of urgency for these workers and their families. The employers should continue to fully comply with the District Court's injunction and your office should ensure that the injunction continues to be fully enforced," Blumenthal stated.

A full text of the letter is attached.

###



[Click Here](#) to be removed from this list

Jennifer Smith

From: Jennifer Smith
Sent: Tuesday, March 05, 2013 3:52 PM
To: Das, Riju (Blumenthal)
Subject: Re: Judge Steckroth's 1113(e) Opinion

Healthbridge/CareOne and its related parties are both owner of land, management of the facilities, and operators of each one as an individual LLC. It's actually pretty ingenious how they've got it set up to pay themselves (way over what the state considers to be fair market rate, FYI) to rent themselves their own land and to manage their own operations.

The entire contracts are set aside, but Deb can answer those kinds of questions in detail.

On Mar 5, 2013, at 3:48 PM, "Das, Riju (Blumenthal)" <Riju_Das@blumenthal.senate.gov> wrote:

Gotcha. And sorry to hear that.

Would you be able to tell me if HealthBridge is just the operator of these facilities or are they the owner as well?

And in the Bankruptcy Court ruling, are both wages and benefits affected or is it just benefits?

Riju Das
Research & Outreach Aide
Office of U.S. Senator Richard Blumenthal
90 State House Square, 10th Floor
Hartford, Connecticut, 06103
Office: 860.258.6949 • Toll Free: 800.334.5341 • Fax: 860.258.6958 • Email:
Riju_Das@blumenthal.senate.gov • Web: www.blumenthal.senate.gov/

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From: Jennifer Smith [<mailto:JSmith@seiu1199ne.org>]
Sent: Tuesday, March 05, 2013 3:46 PM
To: Das, Riju (Blumenthal)
Subject: Re: Judge Steckroth's 1113(e) Opinion

I am actually home sick today. Please feel free to call 1 199' Deborah Chernoff at cell [REDACTED] -- she should be quick to get ahold of and will be able to connect you with info you need.

On Mar 5, 2013, at 3:28 PM, "Das, Riju (Blumenthal)"
<Riju_Das@blumenthal.senate.gov> wrote:

Hey- Andrew Miller from our DC office is trying to get a hold of you to discuss this latest development a bit further. He's a Legislative Aide who works on Labor issues.

If you can give him a call back at your first opportunity, that'd be great.

Thanks!

Riju Das
Research & Outreach Aide
Office of U.S. Senator Richard Blumenthal
90 State House Square, 10th Floor
Hartford, Connecticut, 06103
Office: 860.258.6949 • Toll Free: 800.334.5341 • Fax: 860.258.6958 •
Email: Riju_Das@blumenthal.senate.gov • Web:
www.blumenthal.senate.gov/

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This message originates from the state Office of United States Senator Richard Blumenthal. The information contained in this message may be privileged and/or confidential. If you are not the intended recipient, please notify the sender immediately and destroy this message. Thank you.

From: Jennifer Smith [<mailto:JSmith@seiu1199ne.org>]
Sent: Tuesday, March 05, 2013 3:06 PM
To: Das, Riju (Blumenthal)
Subject: Re: Judge Steckroth's 1113(e) Opinion

HealthBridge being, um, stubborn. The NRLB had to send them the letter telling them to hurry up or be held in contempt.

On Mar 5, 2013, at 3:03 PM, "Das, Riju (Blumenthal)"
<Riju_Das@blumenthal.senate.gov> wrote:

Do you know why there was a delay between the SCOTUS' Feb. 6 ruling that essentially upheld the District Court's injunction and the Mar. 3 return of workers?

Riju Das
Research & Outreach Aide
Office of U.S. Senator Richard Blumenthal
90 State House Square, 10th Floor
Hartford, Connecticut, 06103
Office: 860.258.6949 • **Toll Free:** 800.334.5341 • **Fax:**
860.258.6958 • **Email:**
Riju_Das@blumenthal.senate.gov • **Web:**
www.blumenthal.senate.gov/

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This message originates from the state Office of United States Senator Richard Blumenthal. The information contained in this message may be privileged and/or confidential. If you are not the intended recipient, please notify the sender immediately and destroy this message. Thank you.

From: Jennifer Smith [<mailto:JSmith@seiu1199ne.org>]
Sent: Tuesday, March 05, 2013 12:11 PM
To: Das, Riju (Blumenthal)
Subject: Re: Judge Steckroth's 1113(e) Opinion

I am the easiest for you to get ahold of, so its appropriate and fine for me to be the main contact. If there are detailed legal or policy questions, I may transfer you to someone on staff who is more deeply involved in the specifics than I am. The Senator or Rich are of course welcome to

call David Pickus, 1199 President, whenever they want. :)

On Mar 5, 2013, at 12:01 PM, "Das, Riju (Blumenthal)" <Riju_Das@blumenthal.senate.gov> wrote:

We're discussing this HealthBridge matter and establishing who handles what at SEIU. I've said that you're the primary contact since you've been fantastic about updating us on the latest developments soon after they happen (not sure if that's good or bad for you, but if you get 10 calls from our office from different people, you'll know why! If that happens, which I don't think it will, let me know, and I'll ask it to be toned down).

Riju Das
Research & Outreach Aide
Office of U.S. Senator Richard
Blumenthal
90 State House Square, 10th Floor
Hartford, Connecticut, 06103
Office: 860.258.6949 • Toll Free:
800.334.5341 • Fax: 860.258.6958 •
Email:
Riju_Das@blumenthal.senate.gov •
Web: www.blumenthal.senate.gov/

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in this message may be privileged

and/or confidential. If you are not the intended recipient, please notify the sender immediately and destroy this message. Thank you.

From: Jennifer Smith
[mailto:JSmith@seiu1199ne.org]
Sent: Tuesday, March 05, 2013 11:53 AM
To: Das, Riju (Blumenthal)
Subject: Re: Judge Steckroth's 1113(e) Opinion

I am the Political Director, which means I direct all of our legislative and electoral work. But doesn't always mean I am first-hand involved or am the policy brains on a specific issue. Are you looking for something specific?

On Mar 5, 2013, at 11:32 AM, "Das, Riju (Blumenthal)"
<Riju_Das@blumenthal.senate.gov>
wrote:

Hey Jennifer,

Who does your leg
affairs? Is it you?

Riju Das
Research & Outreach
Aide
Office of U.S. Senator
Richard Blumenthal
90 State House Square,
10th Floor
Hartford, Connecticut,
06103
Office: 860.258.6949 •
Toll Free: 800.334.5341
• Fax: 860.258.6958 •

Email:

Riju Das@blumenthal.senate.gov • **Web:**
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This message originates from the state Office of United States Senator Richard Blumenthal.

The information contained in this message may be privileged and/or confidential. If you are not the intended recipient, please notify the sender immediately and destroy this message. Thank you.

From: Jennifer Smith
[mailto:JSmith@seiu1199ne.org]

Sent: Tuesday, March 05, 2013 10:34 AM

To: Das, Riju (Blumenthal); Kehoe, Richard (Blumenthal)

Subject: Fwd: Judge Steckroth's 1113(e) Opinion

Begin forwarded message:

From:
"Suzanne

Clark"
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From:
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.com]
Sent:
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March

04,
2013
6:59
PM
To:
danr@1199.org;
Suzanne
Hepner
;
klkrieger@jamhoff.com;
dmdalmat@jamhoff.com;
judy.scott@seiu.org;
jmcreane@gmail.com;
nicole.berner@seiu.org;
David
Slutsky;
Suzanne
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james.mcgregor@1199.org
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Ryan J.
Barbur
| View
Bio<<http://www.levyratner.com/atorney.cfm?ID=79>>
rbarbur@levyratner.com>
LEVY
RATNER,
P.C.
80
Eighth
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mail.

Jennifer Smith

From: Jennifer Smith
Sent: Tuesday, March 12, 2013 1:58 PM
To: Mark Ojakian; Andrew Doba
Subject: Fwd: Hilltop Health Center
Attachments: image001.jpg; ATT00001.htm; Ltr Pickus.pdf; ATT00002.htm

Attached is the WARN letter from Hilltop re: closure. As I mentioned, Spectrum is the OPERATOR of this nursing home, but Care Realty (part of the HealthBridge/CareOne conglomeration) is the OWNER of the land/facility and sets the rent costs to Spectrum.

This is a large number of jobs being lost. Please let me know if you have any questions.

Jennifer Smith

Begin forwarded message:

From: "Di Natale, Natale V." <NDiNatale@rc.com>
Date

Natale V. Di Natale

Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Direct 860-275-8329 | Fax 860-275-8299
ndinatale@rc.com | www.rc.com
[Bio](#) | [Contact Card](#)

Boston Providence Hartford New London
Stamford New York Albany White Plains Sarasota

New England Health Care Employees Union, District 1199's Privilege/Redaction Log

**710 Long Ridge Road Operating Company II, LLC, et al.
United States Bankruptcy Court for the District of New Jersey; Case No. 13-13653 (DHS)**

Document No.	Document	Topic	Privilege
01	<ul style="list-style-type: none"> Email communication between Kathy Krieger (James & Hoffman), Judy Scott (SEIU), Suzanne Hepner (Levy Ratner), Edgar James (James & Hoffman), Darin Dalmat (James & Hoffman), and John Creane (John Creane) dated February 25, 2013 	1113(e) motion	Work Product, Common Interest Privilege
02-03	<ul style="list-style-type: none"> Email communications between Kathy Krieger (James & Hoffman), Margery Lieber (NLRB attorney) dated February 25, 2013 	1113(e) motion	Work Product, Common Interest Privilege
04-08	<ul style="list-style-type: none"> Email communications between Dawn Goldstein (NLRB attorney), Suzanne Hepner (Levy Ratner), Kathy Krieger (James & Hoffman), Darin Dalmat (James & Hoffman), Joel Dillard (NLRB attorney), and Nancy Platt (NLRB attorney), dated February 27, 2013 	Contact Information for attorneys; scheduling conference call	Work Product, Common Interest Privilege
09-14	<ul style="list-style-type: none"> Email communication between Abby Simms (NLRB attorney), Kathy Krieger (James & Hoffman), Margery Lieber (NLRB attorney), Joel Dillard (NLRB attorney), Nancy Platt (NLRB attorney), Dawn Goldstein (NLRB attorney), Darin Dalmat (James & Hoffman), and John Creane (John Creane), and Suzanne Hepner (Levy Ratner), dated February 28, 2013 Attachments: ECF Nos. 51, 51-1, 51-2, 51-3, 51-4, 51-5, 51-6, 51-7, 51-8, 51-9 in case no. 13-13653-DHS 	1113(e) motion	Work Product, Common Interest Privilege
16-22	<ul style="list-style-type: none"> Email communications between Abby Simms (NLRB attorney), Kathy Krieger (James & Hoffman), Margery Lieber (NLRB attorney), Joel Dillard (NLRB attorney), Nancy Platt (NLRB attorney), Dawn Goldstein (NLRB attorney), Darin 	Conference Call re: 1113(e) motion	Work Product, Common Interest Privilege

	Dalmat (James & Hoffman), John Creane (John Creane), and Suzanne Hepner (Levy Ratner) dated February 28, 2013 re: Conference Call		
23-25	<ul style="list-style-type: none"> Email communications between Abby Simms (NLRB attorney), Kathy Krieger (James & Hoffman), Thomas Quigley (NLRB attorney), John McGrath (NLRB attorney), Darin Dalmat (James & Hoffman), John Creane (John Creane), Suzanne Hepner (Levy Ratner), Elinor Merberg (NLRB attorney), Bob Omberg (NLRB attorney), Micah Jost (NLRB attorney), and Dawn Goldstein (NLRB attorney) dated February 28, 2013 	1113(e) motion	Work Product, Common Interest Privilege
26-28	<ul style="list-style-type: none"> Email communications between Suzanne Hepner (Levy Ratner), David Pickus (1199), Dawn Goldstein (NLRB attorney), John Creane (John Creane), K. A. Creane (John Creane), Micah Jost (NLRB attorney), John McGrath (NLRB attorney), and Thomas Quigley (NLRB attorney) dated March 1, 2013 	1113(e) motion	Work Product, Attorney Client Privilege, Common Interest Privilege
29	<ul style="list-style-type: none"> Email communication between Suzanne Hepner (Levy Ratner) and Dawn Goldstein (NLRB attorney) dated March 4, 2013 	1113(e) motion	Work Product, Common Interest Privilege
30	<ul style="list-style-type: none"> Email communications between Nicole Berner (SEIU Attorney), Ryan Barbur (Levy Ratner), Dan Ratner (Levy Ratner), Suzanne Hepner (Levy Ratner), Kathy Krieger (James & Hoffman), Darin Dalmat (James & Hoffman), Judy Scott (SEIU Attorney), John Creane (John Creane), David Slutsky (Levy Ratner), Suzanne Clark (1199), James McGregor (1199) dated March 4, 2013 	1113(e) motion; Transfer venue motion	Work Product, Attorney Client Privilege, Common Interest Privilege
31	<ul style="list-style-type: none"> Email communication between Tracy Falcigno (John Creane), Tom Quigley (NLRB attorney), Suzanne Hepner (Levy Ratner), Nicole Berner (SEIU), Kathy Krieger (James & Hoffman), Darin Dalmat (James & Hoffman) dated March 5, 2013 	Employer memo to employees, 10(j) injunction	Work Product, Common Interest Privilege

32	<ul style="list-style-type: none"> Email communications between Darin Dalmat (James & Hoffman), Nicole Berner (SEIU), and Kathy Krieger (James & Hoffman) dated March 6, 2013 	Litigation strategy re Chapter 11	Work Product, Common Interest Privilege
33-43	<ul style="list-style-type: none"> Email communications between Nicole Berner (SEIU), Kathy Krieger (James & Hoffman) and Dawn Goldstein (NLRB attorney), Suzanne Hepner (Levy Ratner) and John Creane (John Creane) dated March 6, 2013 	Scheduling Conference Call re: Connecticut NLRB hearing, bankruptcy case	Work Product, Common Interest Privilege
	<ul style="list-style-type: none"> Email communications between Dawn Goldstein (NLRB attorney), Darin Dalmat (James & Hoffman), Suzanne Hepner (Levy Ratner), Kathy Krieger (James & Hoffman), Abby Simms (NLRB attorney), Nancy Platt (NLRB attorney), Joel Dillard (NLRB attorney), Ryan Barbur (Levy Ratner) and Nicole Berner (SEIU) dated March 6-7, 2013 	Transfer venue motion; review of 1133(e) motion	Work Product, Common Interest Privilege
44	<ul style="list-style-type: none"> Email communications between Kathy Krieger (James & Hoffman), Suzanne Hepner (Levy Ratner), Darin Dalmat (James & Hoffman), Ryan Barbur (Levy Ratner), Abby Simms (NLRB attorney), Nancy Platt (NLRB attorney), and Joel Dillard (NLRB attorney), dated March 7, 2013 	Creditors' Committee, Transfer venue motion	Work Product, Common Interest Privilege
45	<ul style="list-style-type: none"> Email communication between Nicole Berner (SEIU), Dawn Goldstein (NLRB attorney), and Suzanne Hepner (Levy Ratner) dated March 7, 2013 	Media Inquiry	Work Product, Common Interest Privilege
46	<ul style="list-style-type: none"> Email communication between Tracy Falcigno (John Creane), David Pickus (1199), Suzanne Clark (1199), Nicole Berner (SEIU), John McGrath (NLRB attorney), Tom Quigley (NLRB attorney), and Kathy Krieger (James & Hoffman) dated March 6, 2013 Attachment: Letter of Jonathan Kaplan to John Creane dated March 6, 2013 	Letter of Debtor's attorney Jonathan Kaplan to 1199 Attorney John Creane	Work Product, Attorney Client Privilege, Common Interest Privilege
	<ul style="list-style-type: none"> Email communication between Tracy Falcigno (John Creane), David Pickus (1199), Suzanne Clark (1199), Nicole Berner (SEIU), John McGrath (NLRB attorney), Tom Quigley (NLRB attorney), and Kathy Krieger (James & Hoffman) dated March 6, 2013 	Letter of John Creane to Jonathan Kaplan	Work Product, Attorney Client Privilege, Common

	<p>attorney), and Kathy Krieger (James & Hoffman) dated March 8, 2013</p> <ul style="list-style-type: none"> • Attachment: HB Kaplan Response Letter 3/8/2013 		Interest Privilege
47	<ul style="list-style-type: none"> • Email communication between Tracy Falcigno (John Creane), David Pickus (1199), Suzanne Clark (1199), Nicole Berner (SEIU), John McGrath (NLRB attorney), Tom Quigley (NLRB attorney), and Kathy Krieger (James & Hoffman) dated March 8, 2013 • Attachment: HB Kaplan Response Letter 3/8/2013 • Various HealthBridge and Care One memos • Danbury Confidentiality Agreement 	HealthBridge and Care One memos; letter of Jonathan Kaplan and John Creane, HealthBridge and Care One research	Work Product, Attorney Client Privilege, Common Interest Privilege
48-49	<ul style="list-style-type: none"> • Email communication between Tracy Falcigno (John Creane), David Pickus (1199), Suzanne Clark (1199), Nicole Berner (SEIU), John McGrath (NLRB attorney), Tom Quigley (NLRB attorney), and Kathy Krieger (James & Hoffman) dated March 12, 2013 • Attachment: Information Request Letter to HealthBridge dated 3/12/2013 • Attachment: Kaplan Letter dated 3/12/2013 	Information request letter, Kaplan Letter, letter of John Creane to Jonathan Kaplan	Work Product, Attorney Client Privilege, Common Interest Privilege
50-51	<ul style="list-style-type: none"> • Email communication between Tracy Falcigno (John Creane), David Pickus (1199), Suzanne Clark (1199), Nicole Berner (1199), John McGrath (NLRB attorney), Tom Quigley (NLRB attorney), and Kathy Krieger (James & Hoffman) dated March 14, 2013 • Attachments: Letter of Jonathan Kaplan dated 3/13/2013; letter of John Creane dated 3/14/2013 	Letter of John Creane to HealthBridge	Work Product, Attorney Client Privilege, Common Interest Privilege
52-59	<ul style="list-style-type: none"> • Email communications between John McGrath (NLRB attorney) and Suzanne Hepner (Levy Ratner) dated March 8, 2013, March 9, 2013, and March 14, 2013 • Attachments: Subpoenas to HealthBridge in NLRB matters 	2011 NLRB case against Debtors et al.	Work Product, Common Interest Privilege
60-63	<ul style="list-style-type: none"> • Email communications between Suzanne Hepner (Levy Ratner) and Henry Salton (Assistant Att'y General, Connecticut) dated 	Transfer venue motion	Work Product, Common Interest

	March 7, 2013 and March 10, 2013		Privilege
64-78	<ul style="list-style-type: none"> Email communications between Dawn Goldstein (NLRB attorney), Nicole Berner (SEIU), Suzanne Hepner (Levy Ratner), Darin Dalmat (James & Hoffman), Kathy Krieger (James & Hoffman), Ryan Barbur (Levy Ratner), Margery Lieber (NLRB attorney), Elinor Merberg (NLRB attorney), Bob Omberg (NLRB attorney), John McGrath (NLRB attorney), Thomas Quigley (NLRB attorney), Jennifer Dease (NLRB attorney), Abby Simms (NLRB attorney), Nancy Platt (NLRB attorney), Joel Dillard (NLRB attorney), Micah Jost (NLRB attorney), Denise Meiners (NLRB attorney), and Eric Moskowitz (NLRB attorney) dated March 11, 2013 Attachment: Draft legal memorandum re: 1113(e) order 	1113(e) motion, transfer venue motion legal strategy	Work Product, Common Interest Privilege
79-81	<ul style="list-style-type: none"> Email communications between Dawn Goldstein (NLRB attorney), Nicole Berner (SEIU), Kathy Krieger (James & Hoffman), Suzanne Hepner (Levy Ratner), Darin Dalmat (James & Hoffman) Ryan Barbur (Levy Ratner), John Creane (John Creane), Margery Lieber (NLRB attorney), Elinor Merberg (NLRB attorney), Bob Omberg (NLRB attorney), John McGrath (NLRB attorney), Thomas Quigley (NLRB attorney), Jennifer Dease (NLRB attorney), Abby Simms (NLRB attorney), Nancy Platt (NLRB attorney), Joel Dillard (NLRB attorney), Micah Jost (NLRB attorney), Denise Meiners (NLRB attorney), and Eric Moskowitz (NLRB attorney) dated March 14, 2013 Attachment: Draft legal memorandum re: 1113(e) order 	Draft Memorandum re: 1113(e) Order	Work Product, Common Interest Privilege
82	<ul style="list-style-type: none"> Email communications between Kathy Krieger (James & Hoffman), Dawn Goldstein (NLRB attorney), Joel Dillard (NLRB attorney), Nicole Berner (SEIU), Suzanne Hepner (Levy Ratner), Ryan Barbur (Levy Ratner), John Creane (John Creane) and Darin Dalmat (James & Hoffman) dated March 13, 2013 	Legal research re: Transfer venue motion	Work Product, Common Interest Privilege

83	<ul style="list-style-type: none"> Email communication between Suzanne Hepner (Levy Ratner), Dawn Goldstein (NLRB attorney), Elinor Melberg (NLRB attorney), Thomas Quigley (NLRB attorney), Jennifer Dease (NLRB attorney), John McGrath (NLRB attorney), Margery Lieber (NLRB attorney), Bob Omberg (NLRB attorney), Abby Simms (NLRB attorney), Nancy Plat (NLRB attorney), Joel Dillard (NLRB attorney), Micah Jost (NLRB attorney), Denis Meiners (NLRB attorney), Eric Moskowitz (NLRB attorney), Nicole Berner (SEIU), Kathy Krieger (James & Hoffman), Darin Dalmat (James & Hoffman), Ryan Barbur (Levy Ratner) and John Creane (John Creane) dated March 14, 2013 Attachment: Draft Motion to Transfer Venue 	Draft Transfer venue motion	Work Product, Common Interest Privilege
84	<ul style="list-style-type: none"> Email communication between Suzanne Hepner (Levy Ratner), Dawn Goldstein (NLRB attorney), John Creane (John Creane), and Kathy Krieger (James & Hoffman) dated March 15, 2013 	Debtor's request to wait until 3/18/2013 to shorten notice	Work Product, Common Interest Privilege
85	<ul style="list-style-type: none"> Email communications between Kathy Krieger (James & Hoffman), Suzanne Hepner (Levy Ratner), Darin Dalmat (James & Hoffman), Ryan Barbur (Levy Ratner), Nicole Berner (SEIU), Dawn Goldstein (NLRB attorney), Joel Dillard (NLRB attorney), dated March 16, 2013 Attachments: Draft of Motion re: 1113(e) order 	Draft motion re: 1113(e) order	Work Product, Common Interest Privilege
86	<ul style="list-style-type: none"> Email communications between Dawn Goldstein (NLRB), Nicole Berner (SEIU), Kathy Krieger (James & Hoffman), Suzanne Hepner (Levy Ratner), Darin Dalmat (James & Hoffman), Ryan Barbur (Levy Ratner), John Creane (John Creane), Margery Lieber (NLRB attorney), Elinor Merberg (NLRB attorney), Bob Omberg (NLRB attorney), John McGrath (NLRB attorney), Thomas Quigley (NLRB attorney), Jennifer Dease (NLRB attorney), Abby Simms (NLRB attorney), Nancy Platt (NLRB attorney), Joel Dillard (NLRB attorney), Micah Jost (NLRB attorney), Denise Meiners (NLRB attorney), and Eric Moskowitz (NLRB attorney) dated March 	re: Draft motion re: 1113(e) order	Work Product, Common Interest Privilege

	<p>18, 2013 re: Order Shortening Time for Transfer Motion, Draft Joinder and Union Plan re: Transfer Motion to Shorten Time</p> <ul style="list-style-type: none"> • Attachments: Draft of Motion re: 1113(e) order 		
87-89	<ul style="list-style-type: none"> • Email communications between Joel Dillard (NLRB attorney), Kathy Krieger (James & Hoffman), Suzanne Hepner (Levy Ratner), Ryan Barbur (Levy Ratner), Darin Dalmat (James & Hoffman), Dawn Goldstein (NLRB attorney), Abby Simms (NLRB attorney), and Nancy Platt (NLRB attorney) dated March 18, 2013 • Attachment: NLRB Joinder Final.doc • Order shortening time for transfer motion 	NLRB Joinder Transfer venue motion	Work Product, Common Interest Privilege
90-91	<ul style="list-style-type: none"> • Email communications between Tracy Falcigno (John Creane), David Pickus (1199), Suzanne Clark (1199), Nicole Berner (SEIU), John McGrath (NLRB attorney), Tom Quigley (NLRB attorney), and Kathy Krieger (James & Hoffman) dated March 27, 2013 • Attachments: Debtors' Confidentiality Agreements • Attachment: 1199 Information Request Letter 	Debtors' Confidentiality Agreements	Work Product, Attorney Client Privilege, Common Interest Privilege
92	<ul style="list-style-type: none"> • Communication between Honor Heath (Northeast Utilities Service Co.) and Suzanne Hepner (Levy Ratner), dated March 4, 2013 • Attachment: Attorney Work Product 	Transfer venue motion	Work Product, Common Interest
93	<ul style="list-style-type: none"> • Communications between Assistant Attorney General Henry Salton and Suzanne Hepner (Levy Ratner), dated March 10, 2013 and March 6, 2013 and March 5, 2013 	Transfer venue motion	Work Product, Common Interest
94	<ul style="list-style-type: none"> • Communications between Assistant Attorney General Henry Salton and Suzanne Hepner (Levy Ratner), dated March 5, 2013 	Transfer venue motion	Work Product, Common Interest
95	<ul style="list-style-type: none"> • Communications between Suzanne Hepner (Levy Ratner) and Assistant Attorney General Henry Salton, dated March 15, 2013 • 	Transfer venue motion	Work Product, Common Interest

96	<ul style="list-style-type: none">• Communications between Suzanne Hepner (Levy Ratner) and Assistant Attorney General Henry Salton, dated March 15, 2013• Motion to Transfer Venue	First Amendment; Transfer venue motion	Work Product, Common Interest
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